

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

MICHAEL CLARK

Plaintiff,

v.

LIBERTY MUTUAL INSURANCE COMPANY

Defendant.

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NO. 1:22-cv-1089

RESPONSE TO MOTION FOR SANCTIONS

COMES NOW, Toby Gammill, and responds to the motion for sanctions, to wit:

1. The undersigned represented Mike Clark in this matter as an individual plaintiff. Not until the case settled at mediation was there an assignment of claim produced by P&G Construction Consultants.
2. Moreover, the only information related to real parties in interest, ever received from the plaintiff's public adjuster, William Griffin, was his letter of representation as such.
3. Clark was present on zoom for the mediation in his case. Moreover, the mediator was on screen and in the virtual room when the matter was settled by Mr. Clark.
4. Since the email exchanges attached to Defendant's motion, Clark has not returned calls of the undersigned or responded to emails or letter. To counsel's knowledge, this matter settled.

This the 3rd day of October, 2022.

Respectfully submitted,

By: s/ Toby Gammill
Toby J. Gammill (BPR# 025225)
Attorney for Plaintiff

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on October 3, 2022, I emailed the foregoing document to the following counsel of record:

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